

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
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This document relates to:

*Ashton, et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977 (GBD)(SN)

*Bauer, et al. v. al Qaeda Islamic Army, et al.*, 02-cv-7236 (GBD)(SN)

*Ashton, et al. v. The Kingdom of Saudi Arabia*, 17-cv-2003 (GBD)(SN)

**DECLARATION OF DOROTHEA M. CAPONE, ESQ.**  
**IN SUPPORT OF BAUER PLAINTIFF'S MOTION TO CORRECT**

I, DOROTHEA M. CAPONE, ESQ., pursuant to 28 U.S.C. § 1746, hereby state under penalty of perjury that:

1. I am the attorney representing a Plaintiff, referred to herein as the *Bauer* Plaintiff in the above referenced actions, and I submit this Declaration in support of the *Bauer* Plaintiff's Rule 60(a) Motion to Correct Plaintiff's name.

2. *Bauer* Plaintiff has advised my firm of a change in her marital status, and as such she has legally changed her name. This change occurred after the filing the above referenced actions. The Plaintiff is identified on the Exhibit to this Declaration.

3. The correction requested by the *Bauer* Plaintiff is simply clerical in nature and will not in any way change the Court's disposition of this case. Fed. R. Civ. P. Rule 60(a) applies primarily to errors or omissions committed by an attorney or the court which are not apparent on the record. *See In re Merry Queen Transfer Corp.*, 266 F. Supp. 605 (E.D.N.Y. 1967).

4. For the foregoing reasons, the *Bauer* Plaintiff respectfully requests that the Court grant the within motion and allow Counsel for the *Bauer* Plaintiff to enter her correct name into the Court's ECF system so that said Plaintiff may be properly identified during the electronic filing process of any documents in this MDL action and the related aforementioned actions.

Dated: New York, New York  
October 15, 2024

/s/ *Dorothea M. Capone*

Dorothea M. Capone